

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: C.R. BARD, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION**

MDL NO. 2187

**IN RE: AMERICAN MEDICAL SYSTEMS, INC.,
PELVIC REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION**

MDL NO. 2325

**IN RE: BOSTON SCIENTIFIC, PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION**

MDL NO. 2326

**IN RE: ETHICON, INC., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

**IN RE: COLOPLAST PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION**

MDL NO. 2187

THIS DOCUMENT RELATES TO ALL CASES

**RESPONSES AND OBJECTIONS TO “OBJECTORS” COMBINED THIRD
REQUESTS FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES
DIRECTED TO THE FEE AND COST COMMITTEE (FCC) IN CONNECTION WITH
THE REQUEST FOR ALLOCATION OF AGGREGATE COMMON BENEFIT AND
COSTS AWARD**

COMES NOW the Fee and Cost Committee (FCC) and serves its Objections and Responses to “Objectors” Combined Third Requests for Production of Documents and Interrogatories as follows:

GENERAL OBJECTIONS

The FCC is neither a party plaintiff nor a party defendant to this litigation, and therefore, the Interrogatories and Requests for Production of Documents and Things are legally unfounded.

By serving these Objections to the requested discovery, the FCC reserves and does not waive any objection to the legal validity of the form and scope of the requested discovery, which is facially invalid.

The present discovery served by Kline & Specter, P.C., et al., was previously the subject of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” (hereinafter, the “K&S Motion for Discovery”). The K&S Motion for Discovery was denied by Order of the Court dated March 7, 2018. A subsequent “Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award, filed by Kline & Specter, P.C. on July 12, 2018” was likewise denied by the Court on July 13, 2018.

K&S sought no relief from the Court’s Order denying the prior K&S Motion for Discovery or from the Court’s Order denying K&S’s subsequent Motion to Compel. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

INTERROGATORIES

INTERROGATORY NO. 1

With respect to each fee requesting firm's time, fee and costs submissions in connection with the allocation of fee and cost awards, please provide the full and complete reason for each entry considered compensable as for the common benefit and explain in detail the methodology employed for each allowance, the factual basis for each allowance, and the person(s) participating in determining each allowance.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs’ counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC’s discussions and deliberations are confidential.

INTERROGATORY NO. 2

With respect to each and every fee requesting firm whose fee entry requests were denied, explain in detail the methodology employed for each denial, the factual basis for each denial, and the person(s) participating in determining each denial.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of

Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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INTERROGATORY NO. 3

Please provide the specific hourly and lodestar rates awarded to each fee requesting firm and provide the specific reasons for the discrepancies in firm hourly and lodestar rates including the methodology used to determine each firm's hourly and lodestar rate. See List of Fee Awards for Fee Submitting firms, (attached "Exhibit B" from Transvaginal Mesh MDL Common Benefit Fee and Cost Committee Preliminary Written Recommendation, attached hereto as Exhibit "A.")

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with

the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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INTERROGATORY NO. 4

For each fee requesting firm, please explain the methodology and criteria used to prepare the summary of each firm's work, attached as "Exhibit A" to Transvaginal Mesh MDL Common Benefit Fee and Cost Committee Preliminary Written Recommendation, attached hereto as Exhibit "B." Please identify the person(s) participating in the drafting of each summary.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting

counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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INTERROGATORY NO. 5

Please explain the specific methodology used to calculate each fee requesting firms' common benefit allocation, hourly rates, and lodestar, and please explain the criteria methodology used to calculate the fee allocation.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC's discussions and deliberations are confidential.

INTERROGATORY NO. 6

Please explain the criteria and methodology used to calculate the compensable state court time, identify which of the state court trials were compensated for common benefit time, identify the participating firms in each trial, and identify how many hours were considered for the common benefit for each trial.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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INTERROGATORY NO. 7

Please explain the criteria and methodology used to calculate the compensable MDL court trial time, identify which of the MDL trials were compensated for common benefit time, identify the participating firms in each trial, and identify how many hours were considered for the common benefit for each MDL trial.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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INTERROGATORY NO. 8

Explain if a Point System Guide was used to award fee allocations and explain the methodology and criteria provided for in the Guide.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs’ counsel by way of interrogatory or request for production of documents.

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INTERROGATORY NO. 9

State whether any member of the FCC at any time analyzed the considerations outlined by Johnson v. Georgia Highway Express, Inc. in calculating the fees it proposed to allocate to any fee requesting firm; and if so, identify each and every person conducting such analysis and state when each such calculation was performed.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs’ counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC’s discussions and deliberations are confidential.

INTERROGATORY NO. 10

Please provide any information and documents regarding any financial arrangements between and among the FCC member firms, or affiliated firms - in the mesh MDL and other litigation.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of

Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

REQUEST NO. 1

Identify and produce copies of all documents or work papers used to calculate the lodestar of common benefit hours, including the actual lodestars of each fee requesting firm and each member of each firm's staff. The term "work papers" includes: 1) any physical documents or electronically stored information, such as data produced by claimants in support of the hours expended and the claimed rates, together with any multiplier arguably applicable to those hours; and 2) any analysis, reworking, reconfiguration, or reorganization related to such data, or supporting any alternate theory of common benefit work, entered in any digital database or any other spreadsheet, including but not limited to any analysis or consideration of hours, rates, or costs.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs’ counsel by way of interrogatory or request for production of documents.

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REQUEST NO. 2

Identify and produce each and every document received from any fee requesting firm in response to any recommended allocation of common benefit fees, including acceptances, objections, or other replies.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of

Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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REQUEST NO. 3

Please provide copies of any records related to the determination of the specific fee allocation hourly award rates for each fee submitting firm, including all records related to the methodology and criteria used to determine each firm's hourly award rates.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested

discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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REQUEST NO. 4

For each fee requesting firm, identify and produce copies of the summaries of each firm's work, attached as "Exhibit A" to Transvaginal Mesh MDL Common Benefit Fee and Cost Committee Preliminary Written Recommendation, attached hereto as Exhibit "B."

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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REQUEST NO. 5

Identify and produce each and every document reflecting, recording, or otherwise defining the contents of each and every fund available for the payment of common benefit attorneys' fees. This request includes but is not limited to a complete accounting of all moneys deposited into any fund from which attorneys' fees for common benefit work might be paid.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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REQUEST NO. 6

Identify and produce copies of all documents disclosing the current amount of money received pursuant to the 5% assessments along with per firm itemizations of these payments.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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REQUEST NO. 7

Identify and produce copies of each amended fee and expense request of each fee requesting firm following the initial submission of each firm's Affidavit provided to the FCC in

connection with the allocation of cost awards and in compliance with the Fee Committee Protocol.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs’ counsel by way of interrogatory or request for production of documents.

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REQUEST NO. 8

Identify and produce copies of the Affidavits submitted by each fee requesting firm provided to the FCC in connection with the allocation of cost awards.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of

Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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Finally, pursuant to Orders of the Court, the FCC's discussions and deliberations are confidential.

REQUEST NO. 9

Identify and produce any documents related to the criteria and methodology used to calculate the compensable state court time, identify which of the state court trials were compensated for common benefit time and identify how many hours were considered for the common benefit for each trial.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting

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REQUEST NO. 10

Identify and produce any documents related to the criteria and methodology used to calculate the compensable MDL court trial time, identify which of the MDL trials were compensated for common benefit time, and identify how many hours were considered for the common benefit for each MDL trial.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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REQUEST NO. 11

Identify and produce any and all documents reflecting or recording the terms of any and all settlements reached with any Defendant in any Pelvic Mesh related litigation by the PSC, FCC, any of its members, or any participating firm, including third party litigation and settlements of personal injury cases tried against the Pelvic Mesh Defendants, and the amount of attorneys' fees earned.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

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REQUEST NO. 12

If one was used, identify and produce any documents related to the Point System Guide used to award fee allocations and explain the methodology and criteria used in the Guide.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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REQUEST NO. 13

State whether any member of the FCC consulted with an ethicist as to any action taken, agreement entered into, or recommendation made with respect to the allocation of common benefit attorneys' fees, any agreement made or proposed to or by any claimant, and any disbursement of funds; and if so, identify the ethicist consulted, state the date(s) of each and every consultation, and identify and produce each and every document recording or relating to any opinion offered.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs’ counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC’s discussions and deliberations are confidential.

REQUEST NO. 14

Please provide any information and identify and provide any documents regarding any financial arrangements between and among the FCC member firms or affiliated firms, including arrangements in the Pelvic Mesh litigation and any and all other litigation

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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REQUEST NO. 15

Please provide the full documentation of the votes of each FCC member related to the allocation of fees.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs’ counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court’s Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

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REQUEST NO. 16

Please provide the full list of all non-FCC appointed attorneys who participated in the fee allocation process in any way and define their involvement.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a “Motion for Discovery Relating to the Fee and Cost Committee’s Initial Review of Common Benefit Fund Fee Submissions” and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with

the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC's discussions and deliberations are confidential.

REQUEST NO. 17

Please provide the transcripts of all the Fee Requesting Firms' presentations to the FCC.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC's discussions and deliberations are confidential.

REQUEST NO. 18:

Identify each and every person participating in the preparation of each document produced in response to the preceding Requests and to the extent the participants differed in the preparation of each document, please list the participants separately.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC's discussions and deliberations are confidential.

REQUEST NO. 19

Please provide all communications between the FCC and fee requesting firms in reference to the above Requests.

RESPONSE

The discovery sought by the requesting counsel is duplicative and redundant of the discovery requested by way of a "Motion for Discovery Relating to the Fee and Cost Committee's Initial Review of Common Benefit Fund Fee Submissions" and Motion to Compel Production of Documents and Additional Discovery Directed at the Fee and Cost Committee in Connection with the Request for Allocation of Aggregate Common Benefit and Cost Award Motion to Compel filed by the same plaintiffs' counsel in this MDL, which were denied by the Court. The requesting counsel sought no relief from the Court's Order denying this discovery. Therefore, the requested discovery is conclusively barred and precluded by res judicata, collateral estoppel, stare decisis and the law of the case doctrine.

Furthermore, there is no legal authority that would purport to allow counsel for certain plaintiffs in this MDL proceeding to seek discovery from other plaintiffs' counsel by way of interrogatory or request for production of documents.

Finally, pursuant to Orders of the Court, the FCC's discussions and deliberations are confidential.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of the foregoing was served via electronic mail on the following counsel this 24th
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